

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE**

UNITED STATES OF AMERICA)	
)	
v.)	NOS.: 3:21-CR-127-KAC/DCP
)	
ROBERTA LYNNE WEBB-ALLEN)	

**MOTION TO CONTINUE TRIAL
AND EXTEND PRETRIAL DEADLINES**

Comes the Accused, Roberta Lynne Webb-Allen, by and through counsel, and moves this Honorable Court for an Order granting her Motion to Continue Trial and Extend Pretrial Deadlines Motion for Extension of Pretrial Deadlines, in support of which the Defendant Webb-Allen would show as follows:

1. That the Accused was charged by Indictment on October 6, 2021 with interference with commerce by extortion in violation of 18 U.S.C. §1951 and with conspiracy to commit interference with commerce by extortion in violation of 18 U.S.C. §1951 and 2.
2. That this Honorable Court entered a Scheduling Order on October 7, 2021, setting the defensive motion deadline for November 4, 2021 and setting this case for trial on December 14, 2021.
3. That undersigned received initial discovery from the United States on October 14, 2021 and supplemental discovery containing a significant number of wiretaps on October 25, 2021. Additionally, the United States has noted that some evidence may still be forthcoming.
4. That undersigned counsel is in the process of reviewing the discovery with Ms. Webb-Allen. However, additional time is necessary to complete the review.
5. That the United States does not object to the continuance of the trial date and corresponding deadlines.
6. That pursuant to 18 U.S.C.A. § 3161 et seq., the ends of justice will be served by

a continuance of the trial date in this matter and these needs outweigh the interest

of the public and the defendant in a speedy trial. Further, the interests of justice require that this matter be continued in order to allow counsel to render effective assistance of counsel as mandated by the Sixth Amendment to the United States Constitution.

7. That, accordingly, Mrs. Webb-Allen is respectfully requesting a continuance of the trial date and all corresponding pretrial deadlines in this case.

WHEREFORE, the Accused, Roberta Lynne Webb-Allen, respectfully moves this Honorable Court for an Order continuing the trial date and extending the pretrial d deadlines in this case.

RESPECTFULLY SUBMITTED this the 4 November 2021.

/s/ Gregory P. Isaacs

GREGORY P. ISAACS, BPR #013282

/s/ Ashlee B. Mathis

ASHLEE B. MATHIS, BPR #034342

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CERTIFICATE OF SERVICE

It is hereby certified that a true and correct copy of the foregoing pleading was filed electronically and has been served on all counsel of record, pursuant to the Fed. R. Crim. P., by the U.S.D.C. electronic filing system, hand-delivery or by placing a true and correct copy of same in the United States Mail with sufficient postage to carry the same to its destination.

DATED this 4 November 2021.

/s/Gregory P. Isaacs

GREGORY P. ISAACS